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May 11, 2023

VIA ECF

The Honorable Sarah L. Cave
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Paul Phillips, et. al. v. The City of New York, et. al., 21 Civ. 8149
(ALC)(SLC)

Your Honor:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendant City of New York in the above referenced matter. We write in accordance with the Court's Order at Docket 90.

2(a). John Doe No. 1 in plaintiffs' letter at Docket 79, upon information and belief, is NYPD Det. Michael Prilook. Det. Ruben Guerrero and Sgt. Brian Garay, upon information and belief, were also in the NYPD vehicle that was used to transport plaintiff to Rikers Island on July 3, 2020.

2(b) DOC has identified 8 correction officers who were assigned to AMKC Intake for the tour in which plaintiff is believed to have been brought to AMKC on July 3, 2020.

2(c) Immediately following the filing of this letter, I will be forwarding to plaintiffs' counsel the medical records for Paul Phillips that this office obtained with the medical release provided by Mr. Phillips. The medical records reflect the identities of the medical personnel involved in Mr. Phillips's treatment while at AMKC. As to Jane Roe 10 in plaintiffs' letter at Docket 79, the woman who was purportedly working at the medication counter at AMKC in the late morning of July 4 or 5, 2020, HHC has identified the women who were working at the medication counter on those two dates. They are different women for each of the two days. (one per morning)

2(d) DOC has identified 11 correction officers who were assigned to the AMKC medical clinic for the relevant tour on July 3, 2020.

2(e) DOC has identified 7 non-white female captains working at AMKC the morning of March 22, 2020 and 12 non-white female captains working at AMKC the morning of March 23, 2020.

2(f) DOC has identified 2 non-white male captains who were working at VCBC on March 29, 2020 at lunchtime and 4 non-white captains who were working at VCBC on March 30, 2020. (One of the captains worked at that time on both days)

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman
Mark D. Zuckerman

cc: All counsel (via ECF)